

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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DEEPAK BELANI,

Plaintiff,

Civil Action No.: 19-cv-18151

-against-

TESLA, INC.

**PROPOSED JOINT DISCOVERY  
PLAN**

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Defendant.

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In accordance with the Federal Rule of Civil Procedure 26(f), counsel for the parties have conferred and submit to Chambers the following report of their meeting for the Court's consideration:

1. Pursuant to Fed. R. Civ. P. 26(a)(1)(A), the parties have stipulated to forgo formal initial disclosures under Fed. R. Civ. P. 26(a)(1)(A)(i through iv).
2. At this time, the parties anticipate that discovery in this matter will include the production of vehicle service related documentation, subpoenas to any non-party entities in possession of damage or liability related documentation, deposition of Plaintiff, and inspections of the subject vehicle by party experts.
3. At this time, the parties do not anticipate discovery of computer-based or other digital information.
4. Except for good cause shown or by stipulation, no additional parties may be joined after the expiration of 60 days from the date this Order is entered.
5. Except for good cause shown or by stipulation, no amendment to the pleadings will be permitted after the expiration of 30 days from the date this Order is entered.
6. All fact discovery shall be completed on or before March 13, 2020.
7. Plaintiff shall make required Rule 26(a)(2) disclosures with respect to expert witnesses on or before March 31, 2020.
8. Defendant shall make required Rule 26(a)(2) disclosures with respect to expert witnesses on or before April 30, 2020.
9. Expert depositions to be completed on or before May 29, 2020, with deposition(s) of Plaintiff's expert(s) to be completed before the deposition of Defendant's expert(s).
10. Arbitration of this matter to be completed on or before June 30, 2020.
11. Dispositive motions are to be filed by July 31, 2020.

12. A Settlement Conference will be scheduled by the Court on or after July 31, 2020.

Dated: October 30, 2019

**SO ORDERED:**

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Hon. Mark Falk, United States  
Chief Magistrate Judge, D.N.J.

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